

**Resource Conservation and Recovery Act (RCRA) Corrective Action
Determination of Remedy Construction
RCRAInfo Code CA550**

Facility Name: Caribe General Electric Products

Facility Address: Sabana Llana Industrial Park, Río Piedras, Puerto Rico

Facility EPA ID#: PRD000692590

Facility Information

The former Caribe General Electric (GE) Products Inc. (facility) was located in an industrial area in Río Piedras on the northeastern coast of Puerto Rico. The facility covers approximately four acres in a relatively low lying terrain. Currently the facility is bordered to the north by Max Chemicals, to the south by Caribbean Signs, to the east by the Puerto Rico Electric Power Authority's San Juan regional offices, and to the west by Calle 5.

The facility is situated on the northern coastal plain in a relatively flat industrial/urban area of Río Piedras with an elevation between 20 and 40 feet above mean sea level (amsl). The nearest surface water body is Laguna San José, located approximately 2 kilometers north of the facility immediately followed by the Atlantic Ocean north of Laguna San José. Groundwater flow direction at the facility is assumed to be north towards Laguna San José and the Atlantic Ocean. Regional geology of the area is characterized by alluvial deposits (Ref. 4). The alluvium consists of silty and sandy clay and is mainly red or mottled red-light gray in color. The thickness of the unit is estimated to be greater than 100 meters.

The facility was originally used for manufacturing fuses and other electrical accessories including current limiting fuses, home lighting protectors, fuse links, radio energy management systems, watt hour meters, and electrical relays (Ref. 1 & 2). Manufacturing operations began in March 1966 within Building 1. A second building (Building 2) was added to the manufacturing operations in August 1969. Building 2 was reportedly used for storage of finished products manufactured from other GE plants and the manufacturing of plastic parts for electrical accessories. Building 1 was sold to General Electric of Caribe in 1986 (Ref. 1 & 2). The building was subsequently sold to the Puerto Rico Industrial Development Company (PRIDCO) sometime between 1986 and 1999 (Ref. 2). PRIDCO then sold Building 1 to Active Salesman Company in 1999 (Ref. 2). PRIDCO currently owns (i.e., as of 2013) Building 2. The facility is currently used for general storage, warehousing, and process activities involved with the fabrication of metal signage. Active Salesman Company utilizes Building 1 for administrative activities and storage of packing materials and paper products (e.g., take-out containers, paper towels, napkins, etc.). Building 1 stored products used to supply local restaurants and event planning companies. As of 2013, Building 2 was operated by Caribbean Signs to produce signage. The two buildings are no longer connected to one another. Prior to 1985, the facility-generated waste from the GE manufacturing and painting processes included 1,1,1-trichloroethylene, alcohol flux, a corrosive solution from bright dip process, flux oil, lead scrap, polybutadiene resin, sludge from phosphatizing process, sodium hydroxide, spent cresylic acid, spent oil, waste oxidizer, waste paint, and wastewaters from electroplating processes (Ref. 1 & 2).

On August 18, 1980 GE submitted a Notification of Hazardous Wastes Activity to the United States Environmental Protection Agency (EPA) and identified the facility as a Generator and a Treatment, Storage and Disposal (TSD) facility. Then, on November 19 1980, GE submitted the Part A Permit Application to EPA. According to the application, Building 1 was used for the storage of the following hazardous wastes: D001, D002, D008, F001, F004, K054, P104, P098, and U133 while Building 2 stored the following hazardous wastes: D001, D002, K054, and U133. On November 29, 1984 GE submitted a petition to the Puerto Rico Environmental Quality Board (EQB) to reclassify their status to a Large Quantity Generator (LQG). As a result, GE submitted a work plan for closure of its Hazardous Waste

Storage Area on October 20, 1985. The closure work plan was revised by EPA and EQB between 1986 and 1987. A public notice announcing the closure plan was issued on January 16, 1988 and the plan was finally approved by EPA and EQB on March 8, 1988. With the concurrence of EPA (Ref. 3), EQB finally approved the final closure certification for the former Hazardous Waste Container Storage Area on January 28, 1991 (Ref. 4) and the Facility was reclassified as a LQG.

On September 8, 1984 a spill of approximately 20 to 25 gallons of cresylic acid occurred within the Paint Room of Building 1. The spill was contained within the building and spill waste was managed using absorbent pads which were containerized within 55-gallon drums and disposed appropriately (Ref. 1 & 2). On July 6, 1989 EQB conducted a Visual Site Inspection (VSI) as part of a RCRA Facility Assessment (RFA). The RFA recommended further investigation to determine if spill of cresylic acid migrated to soil media (Ref. 1 & 2). Based on the RFA, EPA imposed a RCRA Facility Investigation (RFI) on July 12, 2010 (Ref. 5).

Summary of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs):

In November 1989, a RCRA Facility Assessment (RFA) of the Caribe General Electric Products, Inc. facility in Río Piedras Puerto Rico was completed by EQB. The RFA identified one SWMU, the Hazardous Waste Container Storage Area (SWMU 1), and one AOC, the Paint Room (AOC 1).

SWMU 1 consisted of an 18-ft by 40-ft drum storage area with a 4-inch high dike and three sumps to contain any release of hazardous waste (Ref. 1). The base of the SWMU 1 was made of a 4-inch thick concrete slab. The RFA recommended no further action for SWMU 1. In 1988 this SWMU was closed. EPA and EQB approved the closure of SWMU 1 (Ref. 3 & 4).

AOC 1 was located on the east side of the facility, on the manufacturing area and was used for the painting of relay steel enclosures. Among the raw materials used in this area were paint thinner and cresylic acid. On September 8, 1984 a spill of approximately 20 to 25 gallons of cresylic acid occurred within AOC 1. The spill was contained within the building and spill waste was managed using absorbent pads which were containerized within 55-gallon drums and disposed appropriately (Ref. 1 & 2). The RFA recommended further investigation to determine if spill of cresylic acid migrated to soil media (Ref. 1 & 2). Based on the RFA, EPA imposed a RCRA Facility Investigation (RFI) on July 12, 2010 (Ref. 5). The RFI consisted of surface (0-2 ft) and subsurface (2-4 ft) samples that were collected beneath the concrete slab at the former location of AOC 1 and analyzed for cresol compounds (i.e. 2-methylphenol, 3-methylphenol, 4-methylphenol). Results indicate that surface and subsurface soils beneath AOC 1 were not impacted by cresylic acid. Given the results of the RFI, no groundwater contamination is expected and No Further Action (NFA) is necessary at the facility (Ref. 2). On November 20, 2012, EPA concurred with GE and recommended that Corrective Action at the facility be terminated (Ref. 6).

Determination of Remedy Construction (CA550NR) granted

Based on a review of the information referenced in this document, a determination about “Remedy Construction” has been granted, where no construction is necessary (CA550NR). This designation is due to the fact that the RFI indicates soil media beneath AOC 1 was not impacted by cresylic acid and no groundwater contamination is expected. This determination is expected to be maintained at the former Caribe General Electric Products site, EPA ID# PRD000692590, located at in Sabana Llana Industrial Park, Río Piedras, Puerto Rico, under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.


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References:

1. RCRA Facility Assessment Report, Caribe GE Products, Inc., Río Piedras, Puerto Rico, PRD000692590. Prepared by Puerto Rico Environmental Quality Board. November 1989.
2. RCRA Facility Investigation Report, Río Piedras, Puerto Rico, Caribe General Electric Products, September 2012. Prepared by Arcadis of New York, Inc.
3. Correspondence from Michael Poetzsch, USEPA, to Flor del Valle, EQB. Re: Closure Certification of Container Storage Area, Caribe GE Río Piedras, Puerto Rico. Nov 30, 1990
4. Correspondence from Flor del Valle, EQB, to Heriberto Ayala, Plant Manager Caribe GE Product Río Piedras. Re: Closure Certification Approval Hazardous Waste Containers Storage Area. January 28, 1991.
5. Correspondence from David N. Cuevas, USEPA, to Joel Robinson, Global Remediation Manager GE Consumer & Industrial. Re: RCRA Facility Investigation. July 12, 2010.
6. Correspondence from David N. Cuevas, USEPA, to Joel Robinson, Global Remediation Manager GE Consumer & Industrial. Re: Approval of the September 2012 RCRA Facility Investigation Report, former Caribe GE Products, Río Piedras, Puerto Rico. November 20, 2012.

Locations where references may be found:

References reviewed to prepare this EI determination have been identified under the Facility Information Section. Reference materials are available at U.S. EPA, Region 2.

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